

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

BEAU HEARN,	§	
Plaintiff,	§	
	§	
v.	§	CIVIL ACTION NO.3:21-cv-01648
	§	
KROGER TEXAS, L.P.	§	JURY DEMANDED
Defendant.	§	

DEFENDANT’S APPENDIX IN SUPPORT OF ITS RESPONSE IN OPPOSITION TO PLAINTIFF’S NO-EVIDENCE MOTION FOR PARTIAL SUMMARY JUDGMENT

Exhibit A	App. 1 - App. 22	Relevant excerpts from the transcript of the January 18, 2022 Remote Oral Deposition of Beau Hearn (“Plaintiff’s Deposition”);
Exhibit B	App. 23 - App. 31	Plaintiff’s Responses to Defendant’s First Request for Admissions (“Plaintiff’s Admissions”);
Exhibit C	App. 32 - App. 40	Plaintiff’s Answers and Objections to Defendant’s First Set of Interrogatories (Plaintiff’s Answers to Interrogatories);
Exhibit D	App. 41 - App. 52	Relevant excerpts of Plaintiff's Redacted June 15, 2020 Medical Records from Methodist Richardson Medical Center (produced by Plaintiff in this litigation); and
Exhibit E	App. 53 - App. 58	Relevant excerpts of Plaintiff's Redacted January 4, 2022 Medical Records from Dallas Medical Center/ Lipson Tech, LLC (produced by Plaintiff in this litigation).

Respectfully submitted,

/s/ Michael W. Stumbaugh

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ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been forwarded to all counsel of record pursuant to and in accordance with the Federal Rules of Civil Procedure on May 27, 2022.

/s/ Michael W. Stumbaugh

Michael W. Stumbaugh